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17 Attorneys for Plaintiff United States of America

18 UNITED STATES DISTRICT COURT  
19 EASTERN DISTRICT OF CALIFORNIA

20 United States of America,

Civil Case No. 2:23-cv-02812-TLN-SCR

21 Plaintiff,

JOINT MOTION FOR ENTRY OF  
PERMANENT INJUNCTION AND FINAL  
JUDGMENT AS TO DEFENDANT ARIC  
GASTWIRTH, DEFENDANT RESELLER  
CONSULTANTS, INC., DEFENDANT  
AMBRAGOLD, INC., WON IT ALL, INC.,  
AND RUN IT UP, INC.

22 v.

23 CB SURETY, LLC, et al.,

24 Defendants.

1       On December 1, 2023, the United States of America filed its Complaint for a Temporary  
2 Restraining Order, Preliminary and Permanent Injunctions, and Other Equitable Relief (the  
3 “Complaint”) (ECF No. 1) against Defendant Aric Gastwirth, Defendant Reseller Consultants,  
4 Inc. (“Reseller Consultants”), and Defendant Ambragold, Inc. (“Ambragold”), and other named  
5 Defendants, pursuant to 18 U.S.C. § 1345, based on Defendants’ alleged violations of 18 U.S.C.  
6 §§ 1343, 1344, and 1349. On December 6, 2023, the Court issued its Order granting the United  
7 States’ *Ex Parte* Motion for a Temporary Restraining Order (“TRO”) (ECF No. 7). On January  
8 5, 2024, the Court issued its Order granting the United States’ request for a preliminary  
9 injunction (ECF No. 35). On August 5, 2024, the Court issued its Order granting the United  
10 States’ request to expand the receivership to include the entities Won It All, Inc. (“Won It All”)  
11 and Run It Up, Inc. (“Run It Up”) (ECF No. 82), entities controlled and operated by Defendant  
12 Aric Gastwirth.

13       The United States and Aric Gastwirth, Reseller Consultants, Ambragold, Won It All, and  
14 Run It Up (collectively, the “Gastwirth Entities”) now stipulate and agree to the entry of the  
15 Proposed Stipulated Order for Permanent Injunction and Final Judgment (“Proposed Order”),  
16 lodged concurrently with this Motion. The terms of the permanent injunction are set out in the  
17 Proposed Order. Aric Gastwirth and the Gastwirth Entities stipulate to this Motion and Proposed  
18 Order freely and without coercion. Aric Gastwirth and the Gastwirth Entities further  
19 acknowledge that they have read the provisions of this Motion and the Proposed Order,  
20 understand them, and are prepared to abide by them.

21       The United States and Aric Gastwirth and the Gastwirth Entities agree that the Proposed  
22 Order is lawful and not contrary to public policy. The Proposed Order is the result of fair and  
23 reasonable negotiations between the United States and Aric Gastwirth and the Gastwirth Entities,  
24 which are represented by counsel, and avoids further litigation costs between the United States  
25 and Aric Gastwirth and the Gastwirth Entities.

26       The United States and Aric Gastwirth and the Gastwirth Entities acknowledge and  
27 understand that this Motion and the Proposed Order relate to and are intended to resolve only the

1 claims against Aric Gastwirth and the Gastwirth Entities in the above-captioned civil lawsuit.  
2 This Motion and the Proposed Order do not resolve the United States' claims against any other  
3 entity or individual named in the Complaint. It does not limit the Receiver's authority to act on  
4 behalf of any other Receivership Entity. This Motion and Proposed Order also do not constitute a  
5 global resolution of all potential claims that could be asserted in a future action by the United  
6 States against Aric Gastwirth and the Gastwirth Entities for the conduct alleged in the  
7 Complaint. Specifically, the Proposed Order does not prevent the United States from pursuing  
8 criminal penalties against Aric Gastwirth and the Gastwirth Entities in relation to the conduct  
9 alleged in the Complaint. Nor does it prevent the United States from bringing an asset forfeiture  
10 action seeking to recover funds obtained through the conduct alleged in the Complaint, including  
11 funds held by Aric Gastwirth or the Gastwirth Entities.

12 This Motion and the Proposed Order do not constitute evidence that Aric Gastwirth and  
13 the Gastwirth Entities committed the acts alleged in the Complaint, or in any way prejudice Aric  
14 Gastwirth's and the Gastwirth Entities' ability to contest the allegations in the Complaint in any  
15 future proceeding. This Motion and the Proposed Order relate solely to and constitute the final  
16 judgment solely with respect to the claims against Aric Gastwirth and the Gastwirth Entities in  
17 the above-captioned lawsuit.

18 The undersigned parties and counsel each represent that they are fully authorized to enter  
19 into the terms and conditions of the Proposed Order and to execute and legally bind to this  
20 document the party that they represent.

1 SO STIPULATED AND AGREED:

2  
3 FOR PLAINTIFF UNITED STATES OF AMERICA

4 MICHELE BECKWITH  
5 United States Attorney  
6 TARA AMIN  
7 Assistant United States Attorney

8 YAAKOV ROTH  
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22 Date: May 28, 2025

23 *Attorneys for Plaintiff United States of America*

24 FOR ARIC GASTWIRTH, RESELLER CONSULTANTS, INC., AMBRAGOLD, INC., WON  
25 IT ALL, INC., AND RUN IT UP, INC.

26   
27 MATTHEW JACOBS

28 Date: May 27, 2025

29 *Attorney for Aric Gastwirth, Reseller Consultants, Inc., Ambragold, Inc., Won It All, Inc., and  
30 Run It Up, Inc.*